

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 05-_____
v.	:	DATE FILED: _____
KELLY BAULDREE	:	VIOLATIONS:
	:	18 U.S.C. § 1344 (bank fraud - 1 count)
	:	18 U.S.C. § 1028 (identity theft- 1 count)
	:	18 U.S.C. § 1028A (aggravated identity
	:	theft - 2 counts)
	:	

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. Citizens Bank was a financial institution, the deposits of which were insured by the Federal Deposit Insurance Corporation, certificate no. 57282.

2. From on or about May 4, 2004, to on or about April 21, 2005, in the Eastern District of Pennsylvania, defendant

KELLY BAULDREE

knowingly executed and attempted to execute a scheme to defraud Citizens Bank and to obtain monies owned by and under the care, custody, and control of that bank by means of false and fraudulent pretenses, representations, and promises.

THE SCHEME

3. Defendant KELLY BAULDREE pretended to be a Citizens Bank account holder in order to cash stolen, counterfeit, and otherwise unauthorized checks at Citizens Bank and to make unauthorized withdrawals from Citizens Bank.

4. From on or about May 4, 2004, to on or about April 21, 2005, defendant KELLY BAULDREE presented nine unauthorized checks and one unauthorized counter check at Citizens Bank. When cashing these checks and making these withdrawals, defendant BAULDREE pretended to be three different Citizens Bank account holders and forged their signatures on the checks and deposit/withdrawal slips.

5. Defendant KELLY BAULDREE obtained fake Pennsylvania driver's licenses that identified her as the Citizens Bank account holder that she pretended to be at that time. Defendant BAULDREE presented these fraudulent identifications when attempting to get her transactions processed.

6. By cashing checks and making withdrawals in other people's names, defendant KELLY BAULDREE stole and attempted to steal approximately \$46,800 from Citizens Bank.

In violation of Title 18, United States Code, Section 1344.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From on or about May 4, 2004 to on or about May 6, 2004, in the Eastern District of Pennsylvania, defendant

KELLY BAULDREE

knowingly and without lawful authority used and attempted to use a means of identification of another person with the intent to commit a violation of federal law, that is, bank fraud, in violation of Title 18, United States Code, Section 1344, by using the name of Citizens Bank customer D.I. to commit and attempt to commit fraudulent transactions, and thereby obtained anything of value aggregating \$1,000 or more, that is, approximately \$19,000, in a one year period and thereby affected interstate commerce.

In violation of Title 18, United States Code, Section 1028(a)(7), (b)(1)(D), and (c)(3)(A), and (f).

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

From on or about September 3, 2004 to on or about September 5, 2004, in the Eastern District of Pennsylvania, defendant

KELLY BAULDREE

knowingly and without lawful authority used a means of identification of another person, that is, the name of Citizens Bank customer M.K., during and in relation to a bank fraud, in violation of Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A(a)(1) and (c)(5).

COUNT FOUR

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about April 25, 2005, in the Eastern District of Pennsylvania, defendant

KELLY BAULDREE

knowingly and without lawful authority used a means of identification of another person, that is, the name of Citizens Bank customer E.L., during and in relation to a bank fraud, in violation of Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Section 1028A(a)(1) and (c)(5).

PATRICK L. MEEHAN
UNITED STATES ATTORNEY